

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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FILED
U.S. BANKRUPTCY COURT)
NO JAN 23 P 12:16)
IN THE MATTERS OF S.D. OF N.Y.)
RAHUL MANCHANDA,)
MANCHANDA LAW OFFICE PLLC)
-----X

INDEX NOS. 23-22095, 23-11805
ADVERSARY PROC 24-7009, 24-7010

NOTICE OF MOTION FOR CONTEMPT OF
COURT AGAINST ANDRE DE CASTRO,
BLOCKCHAIN OF THINGS INC, BYRON
QUINTANILLA LAW PLLC, DAVID KAPLAN,
SALVATORE LAMONICA, TRUSTEE GREGORY
ZIPES, TRUSTEE MARIANNE O'TOOLE,
AUSA DANA WALSH KUMAR, JUDGE
SUZANNE ADAMS, AND M.J. VIGILANTE

PLEASE TAKE NOTICE that upon the annexed affirmation of Rahul Manchanda duly affirmed the 23rd day of January 2025, the annexed Memorandum of Law and Exhibits, and all the Pleadings and Proceedings heretofore had herein, the Undersigned will move this Honorable Court at US SDNY Bankruptcy Court, 300 Quarropas Street White Plains, NY 10601-4150 on March 18, 2025 at 9:30 AM or at a mutually agreeable time and place for an order holding Andre De Castro, Blockchain Of Things Inc, et al in Civil and Criminal Contempt of Court pursuant to U.S. Federal Bankruptcy Law for continued willful violations of the Stay pursuant to 111 U.S.C. § 362, and the following:

1. On the grounds that as per the attached, even though the above named individuals have repeatedly been advised by Debtor in writing and verbally, and knows that a Stay exists, but anyway they still continue to willfully and repeatedly continue to fail to comply with this Honorable Bankruptcy Court's orders and jurisdiction, or abide by the Automatic Stay pursuant to 111 U.S.C. § 362 and Protection of this Honorable Court, by continuing to appear, and engage, in court proceedings, in the lower court case 656523/2019 since 2019, in violation of this court's jurisdiction and orders;
2. More egregiously, even though Debtor is owed at least \$1.4 million dollars (1/10 per contract) from a successful IPO which raised \$14 million dollars, to which Debtor invested \$20,000 per contract into Defendant Andre De Castro president of Blockchain Of Things Inc (who was penalized \$250,000 by the Securities Exchange Commission ["SEC"] due to Debtor's complaint),
3. AUSA Dana Walsh Kumar instead chooses to torture Debtor who has no substantial fully owned assets in this court dragging this bankruptcy case on for 2 years, filing adversary proceedings, and ignoring this matter, while AUST Gregory Zipes does the same, all the while Trustee Marianne O'Toole and Chapter 7 Trustee Salvatore Lamonica also continue to ignore Debtor's frantic written pleadings to get involved, whom Judge Sean Lane has stated in court that it is their responsibility as

estate administrator, including any and all lawsuits to collect his money owed, in order to pay any or all of his alleged debts in the above referenced two bankruptcy cases, all of whom are content to simply torture Debtor for the last 2 years, proverbially squeezing blood from a stone;

4. On the grounds that nothing less than damages plus interest, monies owed (at least \$1.4 million dollars) from the successful IPO raising \$14 million to which Debtor invested \$20,000 in, sanctions, penalties, fines, and incarceration will persuade the above referenced individuals to comply with this Honorable Court's jurisdiction and orders;
5. And with regard to the other co-contemnors, even though we have complied with SDNY Bankruptcy Judge Sean Lane's verbal and written instructions to first notify these people in writing and/or verbally of our intent to seek this court's intervention (attached), especially the above named trustees who literally do not even return Debtor's countless emails and requests, they do nothing, hearing after hearing, until now finally it appears that these people have reached the frightening "In Person Pre-Trial Conference at 60 Centre Street Room 300" on March 19, 2025 at 9:30 AM in front of Judge Suzanne Adams, after new co-contemnor Attorney Dave Kaplan, lawyer for Andre De Costa and Blockchain of Things continues to appear, attend, and testify in that court without the presence of Debtor or the notified Trustees, changing and skewing and influencing the case outcome in direct and wilful violation of this bankruptcy court's stay, orders, and jurisdiction, thus necessitating emergency intervention by this bankruptcy court.
6. And for such other further relief as this Honorable Court deems just and proper, including damages plus interest, monies owed (at least \$1.4 million dollars) from the successful IPO raising \$14 million to which Debtor invested \$20,000 in, contempt, costs, penalties, fines, incarceration, and sanctions against them all, for willful violations of this court's orders and jurisdiction, and in light of the information contained herein.



Dated: January 23, 2025
New York, NY

Rahul Manchanda (Pro Se)
270 Victory Boulevard
New Rochelle, New York 10804
Tel: (646) 645-0993

To: Andre De Castro CEO of BlockChain Of Things located at 225 East 36th Street #3E New York NY 10016 and 3401 North Miami Avenue Suite 2030 Miami FL 33127 and his lawyers Dave Kaplan located at 225 West 25th

Street, Apt 6F, New York NY 10001-7130 and Byron Quintanilla of Quintanilla Law PLLC located at 917 Northern Blvd Ste 1 Great Neck, NY 11021, Trustee Salvatore Lamonica, 3305 Jerusalem Avenue, Wantagh NY 11793, Trustee Gregory Zipes, 1 Bowling Green, New York NY 10004, Trustee Marianne O'Toole, 2 DEPOT PLZ STE 2E, BEDFORD HILLS, NY 10507-1849

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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)	ADVERSARY PROC 24-7009, 24-7010
IN THE MATTER OF)	
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)	
RAHUL MANCHANDA,)	AFFIRMATION IN SUPPORT OF
MANCHANDA LAW OFFICE PLLC)	MOTION FOR CONTEMPT
)	
-----X)	

STATE OF NEW YORK }
 : ss
COUNTY OF WESTCHESTER }

RAHUL MANCHANDA affirms the following to be true under penalty of perjury:

1. I make this Affirmation in support of this Motion for Contempt of Court against Andre De Castro president of Blockchain Of Things Inc et al in all respects based upon my personal knowledge of the facts and experiences I relate herein and based upon information and belief, based on the contents of the file.
2. On the grounds that as per the attached, even though the above named individuals have repeatedly been advised by Debtor in writing and verbally, and knows that a Stay exists, but anyway they still continue to willfully and repeatedly continue to fail to comply with this Honorable Bankruptcy Court's orders and jurisdiction, or abide by the Automatic Stay pursuant to 11 U.S.C. § 362 and Protection of this Honorable Court, by continuing to appear, and engage, in court proceedings, in the lower court case 656523/2019 since 2019, in violation of this court's jurisdiction and orders;
3. More egregiously, even though Debtor is owed at least \$1.4 million dollars (1/10 per contract) from a successful IPO which raised \$14 million dollars, to which Debtor invested \$20,000 per contract into Defendant Andre De Castro president of Blockchain Of Things Inc (who was penalized \$250,000 by the Securities Exchange Commission ["SEC"] due to Debtor's complaint),
4. AUSA Dana Walsh Kumar instead chooses to torture Debtor who has no substantial fully owned assets in this court dragging this bankruptcy case on for 2 years, filing adversary proceedings, and ignoring this matter, while AUST Gregory Zipes does the same, all the while Trustee Marianne O'Toole and Chapter 7 Trustee Salvatore Lamonica also

continue to ignore Debtor's frantic written pleadings to get involved, whom Judge Sean Lane has stated in court that it is their responsibility as estate administrator, including any and all lawsuits to collect his money owed, in order to pay any or all of his alleged debts in the above referenced two bankruptcy cases, all of whom are content to simply torture Debtor for the last 2 years, proverbially squeezing blood from a stone;

5. On the grounds that nothing less than damages plus interest, monies owed (at least \$1.4 million dollars) from the successful IPO raising \$14 million to which Debtor invested \$20,000 in, sanctions, penalties, fines, and incarceration will persuade the above referenced individuals to comply with this Honorable Court's jurisdiction and orders;
6. And with regard to the other co-contemnors, even though we have complied with SDNY Bankruptcy Judge Sean Lane's verbal and written instructions to first notify these people in writing and/or verbally of our intent to seek this court's intervention (attached), especially the above named trustees who literally do not even return Debtor's countless emails and requests, they do nothing, hearing after hearing, until now finally it appears that these people have reached the frightening "In Person Pre-Trial Conference at 60 Centre Street Room 300" on March 19, 2025 at 9:30 AM in front of Judge Suzanne Adams, after new co-contemnor Attorney Dave Kaplan, lawyer for Andre De Costa and Blockchain of Things continues to appear, attend, and testify in that court without the presence of Debtor or the notified Trustees, changing and skewing and influencing the case outcome in direct and wilful violation of this bankruptcy court's stay, orders, and jurisdiction, thus necessitating emergency intervention by this bankruptcy court.
7. And for such other further relief as this Honorable Court deems just and proper, including damages plus interest, monies owed (at least \$1.4 million dollars) from the successful IPO raising \$14 million to which Debtor invested \$20,000 in, contempt, costs, penalties, fines, incarceration, and sanctions against them all, for willful violations of this court's orders and jurisdiction, and in light of the information contained herein.

WHEREFORE, it is respectfully requested that this Motion be granted in all respects, together with such other and further relief as this Honorable Court deems to be just and proper, including but not limited to contempt, costs, penalties, fines, incarceration, sanctions, damages plus interest, monies owed (at least \$1.4 million dollars) from the successful IPO raising \$14 million to which Debtor invested \$20,000 in against Defendant for violation of U.S. Federal Bankruptcy Law, willful violations of the Stay pursuant to 11 U.S.C. § 362, and in light of the information contained herein.

Dated: January 23, 2025
New York, NY



Rahul Manchanda (Pro Se)
270 Victory Boulevard
New Rochelle, NY 10804
Tel: (646) 645-0993

CERTIFICATE OF SERVICE

On January 23, 2025, I, Rahul Manchanda, served a copy of this Motion for Contempt of Court and any attached pages to Andre De Castro CEO of BlockChain Of Things located at 225 East 36th Street #3E New York NY 10016 and 3401 North Miami Avenue Suite 2030 Miami FL 33127 and his lawyers Dave Kaplan located at 225 West 25th Street, Apt 6F, New York NY 10001-7130 and Byron Quintanilla of Quintanilla Law PLLC located at 917 Northern Blvd Ste 1 Great Neck, NY 11021, Trustee Salvatore Lamonica, 3305 Jerusalem Avenue, Wantagh NY 11793, Trustee Gregory Zipes, 1 Bowling Green, New York NY 10004, Trustee Marianne O'Toole, 2 DEPOT PLZ STE 2E, BEDFORD HILLS, NY 10507-1849 via Electronic and/or U.S. Mail and/or Facsimile.



By: Rahul Manchanda (Pro Se)
270 Victory Boulevard
New Rochelle, New York 10804
Tel: (646) 645-0993

Subject: Re: eTrack Supreme: MANCHANDA, RAHUL vs. BLOCKCHAIN OF THINGS, INC. (656523/2019) Updated
From: Dave Kaplan <davekaplannyc@aol.com>
Date: 1/23/2025, 12:36 AM
To: Salvatore LaMonica <sl@lhmlawfirm.com>, Dana Walsh Kumar <dana.walsh.kumar@usdoj.gov>, Greg Zipes <greg.zipes@usdoj.gov>, Liza Ebanks-Holley <liza_ebanks@nysb.uscourts.gov>, "trustee@otoolegroup.com" <trustee@otoolegroup.com>, "Rahul Manchanda, Licensed Real Estate Broker Gmail Account" <rahul.manchanda.new.york@gmail.com>
CC: Byron Quintanilla <byron@askquintanillalaw.com>

Dear Bankruptcy Trustee: For the record, defendants have taken no affirmative actions to move (or not move this matter) forward in any manner. The settlement conference is an automatically administratively generated appearance that requires no proactivity. However, I did show up to court today to determine the court's position on the idea of a stay in a bankruptcy case when the **debtor is actually a plaintiff**. In this case, we were hoping to resolve this case with plaintiff as soon as possible. The case was administratively adjourned to 3/19 at 9:30AM IN ROOM 300 at 60 Centre Street, New York NY for a pretrial conference. I clearly told the court today about the stay but again it is unclear what the honorable trustee's position is regarding a stay in a case in which the debtor is plaintiff. Please contact me if there are any questions or concerns.

Dave Kaplan, Esq.
Attorney for Blockchain of Things, Inc.
(917) 208-2105

On Wednesday, January 22, 2025 at 07:06:16 PM EST, Rahul Manchanda, Licensed Real Estate Broker Gmail Account <rahul.manchanda.new.york@gmail.com> wrote:

Bankruptcy
Trustees/US Attorney:

As previously requested please take remedial action on the below continued bankruptcy stay violations in this matter.

Kind regards,

Rahul Manchanda
Licensed Real Estate Broker
Manchanda Real Estate Broker New York LLC
125 Park Avenue, 25th Floor
New York, New York 10017
Tel: (212) 968-8600
Fax: (212) 968-8601
Mob: (646) 645-0993
Email: rdm@manchanda-realestate.com
Web: www.manchanda-realestate.com

Begin forwarded message:

From: no-reply@nycourts.gov
Date: January 22, 2025 at 3:47:52 PM EST
To: info@manchanda-law.com
Subject: eTrack Supreme: MANCHANDA, RAHUL vs. BLOCKCHAIN OF THINGS, INC. (656523/2019) Updated

Index Number: 656523/2019

The following case which you have subscribed to in eTrack has been updated. Changes from the last update are shown in red and are annotated.

Court: New York Supreme Court

Index Number: 656523/2019

Case Name: MANCHANDA, RAHUL vs. BLOCKCHAIN OF THINGS, INC.

Case Type: Comm-Contract

Track: Standard

RJI Number:

Disposition Date:

Date NOI Due: 02/11/2022

NOI Filed: 02/10/2022

Calendar Number: 2022L-00369

RJI Filed: 12/03/2019

Jury Status: Jury At Defendant's Request

Justice Name: Bluth, Hon. Arlene P.

Attorney/Firm for Plaintiff:

MANCHANDA LAW OFFICE PLLC

30 Wall St Ste 8207

New York, NY 10005-2201

Attorney Type: RETAINED

Status: Active

Attorney/Firm for Plaintiff:

Law Offices of Robert G. Androsiglio, P.C.

30 Wall St FL 8

New York, NY 10005-2205

Attorney Type: RETAINED

Status: Active

Attorney/Firm for Plaintiff:

Trujillo, Luis

30 Wall street

8th Floor

New York, NY 10005

Attorney Type: RETAINED

Status: Active

Attorney/Firm for Defendant:

DAVID A KAPLAN ESQ

225 W 25TH ST APT 6F

NEW YORK, NY 10001-7130

Attorney Type: RETAINED

Status: Active

Attorney/Firm for Defendant:

GLEASON & KOATZ LLP

122 E 42ND ST STE 620

NEW YORK, NY 10168-0002

Attorney Type: RETAINED

Status: Active

Attorney/Firm for Defendant:

GLEASON & KOATZ, LLP

122 E 42ND ST

NEW YORK, NY 10168-0002

Attorney Type: RETAINED

Status: Active

Attorney/Firm for Defendant:
Ask Quintanilla Law, PLLC
917 Northern Blvd
Great Neck, NY 11021-5304
Attorney Type: RETAINED
Status: Active

Last Appearance Date: 01/22/2025 --- *Information updated*
Appearance Time: 10:30 AM
On For: Conference-Settlement
Appearance Outcome: Adjourned --- *Information updated*
Justice:
Part: Early Settlement Conference-1/M.J.Vigilante, ESQ.
Comments: IN PERSON SETTLEMENT CONFERENCE W/ SEN. SETTLEMENT COORDINATOR MILES VIGILANTE
ESQ. 80 CENTRE STREET ROOM 106

Future Appearance Date: 03/19/2025 --- *Information updated*
Appearance Time: 09:30 AM --- *Information updated*
On For: Conference-Pre-Trial --- *Information updated*
Appearance Outcome: --- *Information updated*
Justice: Adams, Hon. Suzanne J. --- *Information updated*
Part: 40 Trial Ready --- *Information updated*
Comments: IN PERSON PRE-TRIAL CONFERENCE 60 CENTRE ST RM 300 --- *Information updated*
Older appearances may exist but are not shown.

Motions: Motion Number: 3
Date Filed: 05/27/2021
Filed By:
Relief Sought: Attorney - Disqualify/Relieve/Substitute/Withdraw
Submit Date: 06/17/2021
Answer Demanded: No
Status: Decided: 06/17/2021
Decided
Bluth, Hon. Arlene P.
Decision: Short Form Order
Order Signed Date: 06/17/2021

Motion Number: 2
Date Filed: 12/20/2019
Filed By:
Relief Sought: Attorney - Disqualify/Relieve/Substitute/Withdraw
Submit Date: 01/07/2020
Answer Demanded: Yes
Status: Decided: 01/08/2020
Decided
Kahn, III, Hon. Francis A.
Decision: Short Form Order
Order Signed Date: 01/08/2020

Motion Number: 1
Date Filed: 12/03/2019
Filed By:
Relief Sought: Dismiss
Submit Date: 06/04/2020
Answer Demanded: Yes
Status: Decided: 06/04/2020
Decided
Bluth, Hon. Arlene P.
Decision: Short Form Order
Order Signed Date: 06/04/2020

To access this case directly [click here](#).

This is an automated e-mail. If you have questions about your case please contact the Court directly.